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4 Attorney for Plaintiffs-In-Intervention

5
6 **UNITED STATES DISTRICT COURT**
7 **FOR THE**
NORTHERN MARIANA ISLANDS

8 **U.S. EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION,**

9 Plaintiff,

Case No. CV 07-0029

10 **v.**

11 **L & T INTERNATIONAL
CORPORATION, L&T GROUP OF
COMPANIES, LTD., TAN
HOLDINGS CORPORATION, TAN
HOLDINGS OVERSEAS
INCORPORATED, CONCORDE
GARMENT MANUFACTURING
CORPORATION, and DOES 1-5,
Inclusive,**

12 Defendants.

13 **DECLARATION IN SUPPORT OF
MOTION FOR LEAVE TO
INTERVENE**

14
15 **ABELLANOSA, JOANNA, ET AL.,**

16 Plaintiffs-In-Intervention.

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18 I, **JOE HILL**, hereby declare as follows:

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20 1. I am over the age of eighteen years old, have personal knowledge of the facts set
forth herein, am competent to testify as to these facts , and if called would testify as stated
herein.

JOE HILL
Attorney at Law
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1 2. I am the attorney for Plaintiffs-In-Intervention in the above-entitled case.

2 3. On or about May 17, 2004, the Plaintiffs-In-Intervention timely filed their charge
3 with the EEOC.

4 4. On September 12, 2007, Plaintiff EEOC, the federal agency charged with the
5 administration, interpretation and enforcement of Title VII, brought the instant action on
6 behalf of Marlou Aranda and a class of 81 additional Charging Parties pursuant to Title VII
7 of the Civil Rights Act of 1964, as amended, and Title I of the Civil Rights Act of 1991, to
8 correct unlawful employment practices on the basis of national origin and to provide
9 appropriate relief.

10 5. Shortly thereafter, I informed counsels for Defendants of Intervenors' intention to
11 intervene and file a complaint herein. Likewise I informed counsel for EEOC of the said intent
12 to intervene and file a complaint in intervention.

13 6. Plaintiffs-In-Intervention have the right to intervene in the instant action pursuant
14 to Title VII of the Civil Rights Act of 1964, as amended, Title I of the Civil Rights Act of
15 1991, and Fed. R. Civ. P., Rule 24.

16 7. On January 23, 2008, counsel for Plaintiffs-In-Intervention caused a true and
17 correct copy of the Notice and Motion for Leave to Intervene and proposed Complaint-In-
18 Intervention to be electronically filed and served on Defendants' counsels, Steven P. Pixley
19 and Colin M. Thompson. Likewise my office staff also filed and served a true and correct
20 copy of the Notice and Motion for Leave to Intervene and proposed Complaint-In-Intervention
21 on Greg McClinton, the counsel for EEOC.

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1 8. Plaintiffs-In-Intervention bring their claims against all Defendants pursuant to the
2 Civil Rights Act of 1964, as amended, Title I of the Civil Rights Act of 1991, FLSA, MWHA
3 and the NWA.

4 9. The Court has jurisdiction over Plaintiffs-In-Intervention's claims pursuant to
5 Section 706(1) and (3) and 707 of Title VII of the Civil Rights Act of 1964, as amended,
6 Section 102 of Title I of the Civil Rights Act of 1991.

7 10. The Court also has jurisdiction over Plaintiffs-In-Intervention's FLSA claims
8 under 28 U.S.C. § 1331, and as proceeding arising under an Act of Congress regulating
9 commerce pursuant to 28 U.S.C. § 1337(a).

10 11. Finally, the Court has jurisdiction over Plaintiffs-In-Intervention's wage claims
11 pursuant to 29 U.S.C. § 219(b) and Section 207 (a) and jurisdiction over Plaintiffs-In-
12 Intervention's pendent state claims pursuant to 28 U.S.C. § 1367.

13 12. A copy of the complaint-in-intervention of the Plaintiffs-In-Intervention is attached
14 hereto and filed concurrently with this motion to intervene.

15 I declare under penalty of perjury that the foregoing is true and correct and that this
16 declaration was executed this 23rd day of January, 2008, in Saipan, Commonwealth of the
17 Northern Mariana Islands.

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/s/

JOE HILL
Declarant

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